

On pages 2-3 of the Office Action, claims 7-9 and 15 are rejected as being unpatentable over **Jones** (U.S. Patent No. 4,580,626) in view of **Owens** (U.S. Patent No. 4,441,742).

The present Invention, as defined in Independent claim 7, includes a vertically disposed actuator assembly, a pair of rams for isolating the well and a pair of shear blades for cutting off an intervention string. Note that independent claim 7 specifically requires that the rams and blades, which are radially movable, and the actuator assembly are located within the housing of the riser control device.

As described in the previous response, **Jones** discloses a blowout preventer having shear rams that are hydraulically actuated by pistons mounted on the axis of the ram. The pistons are provided in a separate housing located on the outside of a drill string or riser. This known arrangement is totally different from the present invention with regard to the mechanism and arrangement for driving the shear rams.

Owens discloses a remotely operated connector that is designed to connect underwater well members. However, the **Owens** system for "connecting" well members has nothing in common with the present invention, which is related to a riser control device for preventing and controlling unexpected blow-outs or well disruptions.

In the explanation of the rejection, the Examiner states that:

"Owens shows a similar riser control device having a pair of rams vertically actuatable to isolate the well (figures 1-2) where the actuator is hydraulically driven and annular piston and chamber device (claim 8; 43), which via piston rods (45) and translation beams 26/54/40 transforms the movement of the piston to open or close the rams whereby the radial movement of the shear blades implies radial movement of the rams (claims 9, 15 & 6)."

The Examiner's characterization of the Owens connector as a "riser control device" is clearly incorrect. Also, Owens does not have a pair of rams that can be actuated to control the well. Although the Examiner refers to Figs. 1-2 as showing rams that control the well, these figures actually show a portion of an underwater wellhead assembly with a connector disposed outside of and connecting a lowermost body 1 and an upright wellhead lower body 2 (see col. 3, lines 49-52). The connector does not function to isolate the well. Note, in the event that the Examiner decides to maintain this rejection, then the Examiner is requested to specifically identify the rams in Owens and explain how they function to isolate the well.

Further, it is submitted that one of ordinary skill in the art would not have been motivated to combine the BOP of Jones and the connector of Owens because the resulting structure would simply be a combined BOP and connector. There is no suggestion or motivation to modify the Jones BOP with the driving mechanism of the Owens connector.

Also, Owens teaches that the connector mechanism is provided in a separate housing or pocket on the outside of the well housing. This is clearly different from the device defined in claim 7 in which the vertically disposed actuator assembly is provided inside the housing of the riser control device, and functions to simultaneously drive the rams and the blades, which are also disposed in the housing.

Further, it is submitted that the Examiner has also mis-characterized other features of the Owens connector. In particular, Owens does not have shear blades nor an annular piston. Note that the pistons, disclosed in the Owens reference, are common piston/cylinder devices (i.e. circular discs disposed in cylindrical chambers). Clearly, the piston/cylinder arrangement of Owens cannot be construed as an annular piston in an annular chamber.

Claim 8 specifically requires a hydraulically driven annular piston disposed in an annular chamber. Therefore, even if the references could be combined, the proposed Jones/Owens combination does not meet each and every limitation of claim 8.

In view of the above, it is submitted that the present invention, as defined in claims 7-9 and 15 is clearly allowable over the prior art of record. The Examiner therefore is requested to withdraw the rejection of these claim and pass this case to issue.

In the event that the Examiner has any comments or suggestions of a nature necessary to place this case in condition for allowance, then the Examiner is requested to contact Applicant's undersigned attorney by telephone to promptly resolve any remaining matters.

Respectfully submitted,

Per ALMDAHL et al.

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